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7 Attorneys for Defendants

8 UNITED STATES DISTRICT COURT
9 SOUTHERN DISTRICT OF CALIFORNIA
10

11 FARAMARZ RASSOULI, ZAHRA)
12 RASSOULI, AND POUYA RASSOULI,)

13 Plaintiffs,)

14 v.)

15 MICHAEL CHERTOFF, Secretary of U.S.)
16 Department of Homeland Security; et al.,)

17 Defendants.)

Case No. 07cv2411-JAH (JMA)

JOINT MOTION TO EXTEND TIME TO
ANSWER

[FED. R. CIV. P. 6(b)(1)]

18 COME NOW THE PARTIES, Plaintiffs Faramarz Rassouli, Zahra Rassouli, and Pouya Rassouli,
19 by and through counsel, Robert A. Mautino, and Defendants Michael Chertoff, et al., by and through
20 their counsel, Karen P. Hewitt, United States Attorney, and Megan Callan, Assistant United States
21 Attorney, and hereby jointly move the Court to extend the time for Defendants to answer Plaintiffs'
22 Complaint.

23 The parties are working toward an extrajudicial resolution of Plaintiffs' complaint, and the parties
24 have agreed that additional time is necessary in order to pursue resolution of Plaintiffs' claims without
25 intervention of the Court. Without waiving Defendants' rights to defend the causes of actions and
26 allegations, the parties jointly agreed to request this continuance. The parties have not previously
27 requested such continuance.

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1 Based upon the foregoing, it is respectfully requested that the Court enter an order, under
2 FED. R. CIV. P. 6(b)(1), extending the time for Defendants to file their answer to Plaintiffs' Complaint
3 until **May 19, 2008**.

4
5 DATED: February 19, 2008

Respectfully submitted,
6 s/ Robert A. Mautino
ROBERT A. MAUTINO
Attorney for Plaintiff
7 E-mail: bob@mautino.org

8 Pursuant to Section 2(f)(4) of the Electronic Case Filing Administrative Policies and Procedures
9 of the United States District Court for the Southern District of California, I certify that the content of this
10 document is acceptable to counsel for the Plaintiff and that I have obtained authorization from Robert
11 A. Mautino to affix his electronic signature to this document.

12
13 DATED: February 19, 2008

KAREN P. HEWITT
United States Attorney

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15 s/ Megan Callan
MEGAN CALLAN
Assistant U.S. Attorney
16 Attorneys for Defendants
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9 UNITED STATES DISTRICT COURT
10 SOUTHERN DISTRICT OF CALIFORNIA

11 FARAMARZ RASSOULI, ZAHRA)
12 RASSOULI, AND POUYA RASSOULI,)

13 Plaintiff,)

14 v.)

15 MICHAEL CHERTOFF, Secretary of U.S.)
16 Department of Homeland Security; et al.,)

17 Defendants.)

Case No. 07cv2411-JAH (JMA)

CERTIFICATE OF SERVICE

18 IT IS HEREBY CERTIFIED THAT:

19 I, the undersigned, am a citizen of the United States and am at least eighteen years of age. My
20 business address is 880 Front Street, Room 6293, San Diego, California 92101-8893.

21 I am not a party to the above-entitled action. I have caused service of: JOINT MOTION TO
22 EXTEND TIME TO ANSWER on the following party by electronically filing the foregoing with the
Clerk of the District Court using its ECF System, which electronically provides notice.

23 Robert A. Mautino
Attorney for Plaintiff
bob@mautino.org

24 I declare under penalty of perjury that the foregoing is true and correct.

25 Executed on February 19, 2008.

26
27 s/ Megan Callan
Megan Callan
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